REMARKS

I. Introduction

Claims 1-23 are pending in the application. Claims 19-23 are added in this response. In the Office Action mailed January 20, 2004 (hereinafter the "Office Action"), the specification was objected to due to informalities. The drawings were objected to due to inconsistencies. Claims 1 and 13 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,643,641, issued to Snyder (hereinafter "Snyder"). Claims 1-3, 5, and 11-13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,516,338, issued to Landsman (hereinafter "Landsman") in view of U.S. Patent No. 6,134,597, issued to Rieth (hereinafter "Rieth"). Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Landsman in view of Rieth, and further in view of U.S. Patent No. 6,175,833, issued to West (hereinafter "West"). Claims 8-10 and 14-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Landsman in view of Rieth, and further in view of U.S. Patent No. 6,453,404, issued to Bereznyi et al. (hereinafter "Bereznyi").

II. Objections to the Specification

In the Office Action, the specification was objected to because the "claim section of the disclosure must commence on a separate sheet of paper." Office Action, p. 2. As suggested by the Examiner, the first two lines of the page containing the claims have been moved to the end of the last page of the specification. The Office Action also identified that the word "hash" is incorrectly spelled as "has" on p. 14, line 18. Accordingly, applicant has corrected the typographical error on p. 14. Additionally, the Office Action objected to the specification stating that FIGURE 7 on p. 15, line 3, should be changed to FIGURE 8. Accordingly, the specification has been amended to correct the typographical error on p. 15, line 3, to properly reference FIGURE 8.

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Based on the above, applicant requests withdrawal of the objections to the specification.

III. Objections to the Drawings

In the Office Action, the drawings were objected to "because FIGURE 1 and FIGURE 2 do not use labels, for example, in items 78 and 80, that clearly point out what these items refer to." Office Action, p. 2. However, applicant submits that FIGURES 1 and 2 are properly labeled and sufficiently described in the specification as to what those labels identify. For example, referring to items 78 and 80 of FIGURES 1 and 2, those items are discussed in detail in the specification beginning on p. 9. In particular, item 78 is identified as a content server and item 80 is identified as an advertisement server. *See* Application, p. 9. Accordingly, withdrawal of the Examiner's objection of FIGURES 1 and 2 as not being properly labeled is requested.

FIGURE 3 was objected to because the "END" step was improperly labeled as item 302. As suggested by the Examiner, FIGURE 3 has been amended to conform to the specification by changing 302 to 320.

FIGURE 12 was objected to because it contains two items with the label of 60. As suggested by the Examiner, FIGURE 12 has been amended to properly identify optical drive interface as label 58.

FIGURE 12 was also objected to for failing to comply with 37 C.F.R. § 1.84(p)(5) because modem 69 does not appear in the specification. Additionally, FIGURE 9 was objected to under the same rule because decision block 920 is not mentioned in the specification. The specification has been amended, as illustrated above, to properly identify modem 69 and decision block 920.

Based on the above, applicant respectfully requests withdrawal of the objections to the drawings.

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IV. Rejections of the Claims

Claims 1 and 13 were rejected under 35 U.S.C. § 102(e) as being anticipated by Snyder. Claims 1-3, 5, and 11-13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Landsman in view of Rieth. Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Landsman in view of Rieth, and further in view of West. Claims 8-10 and 14-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Landsman in view of Rieth, and further in view of Bereznyi.

Applicant submits that Claims 1-18 are in condition for allowance because the cited and applied references, alone or in combination, fail to teach or suggest a computer system for processing multi-portioned data. More specifically, applicant submits that the cited references fail to teach or suggest a system for performing the method of associating data with a data request, as described and claimed in the present application. Additionally, the cited references do not describe a system that receives a first request for provider data, generates and associates a first identifier with the request for provider data, returns a first portion of the provider data, and stores a second portion of the provider data. Still further, the cited references fail to teach or suggest a system that obtains a second request for a second portion of the provider data, generates and associates a second identifier with the second request and returns the second portion of the provider data if the second identifier matches the first identifier. Prior to providing a more detailed discussion as to the patentability of the claims of the present application, a brief discussion of the present application and cited art will be presented.

A. Summary of the Present Invention

The present invention is generally directed toward a system and method for processing multi-portion data. Multi-portioned data may include, for example, a URL as the first portion and an HREF as a second portion. The system includes a content server that obtains a request

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for data, generates an identifier corresponding to the request and associates the identifier with the request. *See* Application, p. 12, lines 20-25. The content server returns a first portion of the data, such as the URL, and stores the second portion of the data, such as the HREF, in a cache according to the first identifier. *Id.* Thereafter, the content provider receives a request for the remaining portion of the provider data, generates a second identifier and associates the second identifier with the second request. The system then compares the two identifiers and, if they match, the content server returns the second portion of the data.

Numerous advantages may be realized in accordance with one or more of the embodiments of the present invention. In one aspect, the present invention provides the ability for processing multi-portion data and for transferring the data in response to requests for the data portions. This resolves the problem of network protocols preventing third party servers from returning multiple data references. Typically, network protocols could prevent third party servers from returning both an advertisement media and a redirection reference. In those instances, often the advertisement media is transferred to a browser application while the redirection reference is lost. In such an instance, if a user viewing the advertisement wishes to access the advertisement provider, the redirection request cannot be completed because the redirection reference was not transferred by the third-party server. Additional advantages may also be realized in accordance with the present invention.

B. U.S. Patent No. 6,643,641 to Snyder

Snyder is purportedly directed toward an improved Internet search engine that has three main components, shown generally in Figure 1 of Snyder. In particular, the search engine of Snyder includes a Web Crawler 60 with "crawler processes that fetch files from web pages in the universe of web pages to be subject to search, and the processes that index or catalog the pages and render the fetched files into graphic image files." Snyder, Col. 11, lines 1-6. Those

processes obtain raw data and process it to provide a database 62 and information that may be included in search reports. *Id.* at Col. 11, lines 6-11. Preparation of database 62 "allows a search to be conducted more quickly by reference to the processed database information gleaned from the field of possibly-selected files, than would be possible if a search engine attempted to load and analyze the entire universe of files after the user had submitted query 54 (FIG. 3), namely while the user was awaiting search results." *Id.* at Col. 11, lines 27-33.

Snyder fails to teach or suggest a system and method that allows multi-portion data to be delivered separately to a requesting party. Snyder also fails to teach or suggest generating and associating identifiers with requests for data. Still further, Snyder fails to teach or suggest comparing the generated identifiers and returning a second portion of data if the identifiers match.

C. U.S. Patent No. 6,516,338 to Landsman

Landsman is purportedly directed to a technique for implementing in a networked-server environment, e.g., the Internet, network-distributed advertising in which advertisements are downloaded from an advertising server to a browser executing at a client computer. *See* Landsman, Abstract. In particular, Landsman teaches embedding an HTML advertising tag containing two components into a referring Web page. One component of the tag downloads, from a distribution Web server, and then instantiates an agent at the client browser. The other component is a reference, in terms of a Web address, of the advertising management system. The ad management system selects the given advertisement that is to be downloaded, rather than having that selection or its content being embedded in the Web content page.

Landsman fails to teach or suggest a system and method that allows multi-portioned data to be divided and delivered separately to a requesting party. As acknowledged in the Office Action, Landsman fails to teach storing a second portion according to the first identifier,

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obtaining a request for the second portion with an associated second identifier, and returning the second portion if the second identifier matches the first identifier. Additionally, Landsman also fails to teach or suggest generating identifiers, associating those identifiers with requests for data, and comparing those identifiers prior to returning a second portion of data in response to a request.

D. U.S. Patent No. 6,134,597 to Rieth

Rieth is purportedly directed toward a system and method for operating a server to authorize client access to server objects based upon compressed object identifiers. *See* Rieth, Abstract. A compressed object identifier, as described in Rieth, is generated by CRC hashing a string formed by concatenating a user attribute, a user profile, an object identifier, and a key. The resulting identifier is associated with a client object to form a server object. Thereafter user access is authorized by CRC hashing to the same object identifier from a user request. *Id.* at Col. 2, lines 25-33.

Rieth is not directed toward, and does not describe, separately delivering multi-portion data. In particular, Rieth fails to teach or suggest a system and method for providing a first portion of data in response to the request. Additionally, Rieth does not discuss or describe storing a second portion of the data and, in response to receiving a second request, providing the second portion in response to a second request.

V. The Claims Distinguished

A. Claim 1

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by Snyder, and under 35 U.S.C. § 103(a) as being obvious over Landsman in view of Rieth. Claim 1, as amended, reads as follows:

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1. A method in a computer system for associating provider data including a first and second portion with a data request, the method comprising:

obtaining a first request for the provider data;

in response to obtaining the first request:

generating a first identifier corresponding to the first request;

associating the first identifier with the request for the provider data;

returning the first portion of the provider data; and

storing the second portion of the provider data according to the first identifier;

obtaining a second request for the second portion of the provider data; and

in response to obtaining a second request:

generating a second identifier corresponding to the second request;

associating the second identifier with the second request; and

returning the second portion of the provider data if the second identifier matches the first identifier.

The present invention, as recited in Claim 1, describes a method in a computer system for associating data with a data request and separately providing portions of the data in response to separate requests. As described in Claim 1, a computer system performs the method of associating data by obtaining a first request for provider data including a first portion and a second portion. The system, in response to receiving a first request for provider data, generates a first identifier corresponding to the request, and associates the first identifier with the request. The first identifier, as described in the present application, may be, for example, a hash key value representative of the request. *See* Application, p. 11, lines 10-16. The system returns the first portion of the provider data to the requesting party. The second portion of the provider data is

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stored, for example, in a cache hash table according to the first identifier. *Id.* at p. 11, lines 27-28. Still further, as described with respect to Claim 1, in response to a request for a second portion of the provider data, the system generates a second identifier representative of the second request, associates that identifier with the second request and returns the second portion of the provider data if the second identifier matches the first identifier. Thus, the invention as described in Claim 1 provides the ability to associate and return multi-portioned data in response to a request.

1. 35 U.S.C. § 102(e) Rejection

In contrast to the claims of the present invention, Snyder teaches an enhanced Internet search engine. As described above, Snyder's search engine includes a Web crawler which obtains Web pages and generates a database of information that includes a snapshot or image of the crawled Web page. The user, in response to submitting a request to the search engine of Snyder, receives a report containing hits and images from the database. Although a user submits search terms and receives a report of hits, there is no discussion of multi-portion data and generating identifiers for portions of data and returning particular portions of the data. Additionally, there is no discussion of generating identifiers, associating those identifiers with requests and returning data if identifiers match.

The Office Action asserts that in Snyder, a first portion of the data is the search report page, and a second portion of the data is URLs of the actual Web pages from third parties returned on search report. *See* Office Action, p. 4. Additionally, the Office Action asserts that the first identifier "is the search criteria, i.e., search terms, entered by the user" and that the second identifier is disclosed in Snyder as a "URL or hypertext link." *Id.*, pp. 4-5.

However, Claim 1, as amended, clarifies that the first identifier is generated in response to a first request and corresponds to the first request. In contrast, the "first identifier" of Snyder

(search term), as acknowledged in the Office Action, is entered by the user. Search terms are not generated in response to a first request and correspond to the first request, as called for in Claim 1. Accordingly, the search terms cannot be considered a first identifier.

Still further, the Office Action asserts that a second identifier is described in Snyder as a URL or hypertext link. However, Claim 1, again, has been amended to clarify that the second identifier is generated in response to obtaining a second request for the second portion of the provider data. Additionally, the second identifier is generated to correspond to the second request. The URL's of Snyder are not generated in response to a second request nor do they correspond to a second request.

Finally, Snyder does not disclose or describe returning a second portion of provider data if the second identifier matches the first identifier, as called for in Claim 1. Not only does Snyder not describe a first identifier or a second identifier, there is also no discussion comparing identifiers and returning a second portion of data if the identifiers match, as called for in Claim 1. Not only does Snyder not describe generating identifiers corresponding to those requests, there is also no need for comparing identifiers in the invention described in Snyder. In particular, the information returned in response to the user search in Snyder is obtained from a database and provided to a user. There is no need to confirm that two requests are related by comparing identifiers corresponding to those requests. Accordingly, there is no discussion in Snyder of comparing generated identifiers and returning the second portion of the data if those identifiers match.

Applicant asserts that Snyder does not teach a system and method for associating and processing multi-portion data. Nor does Snyder teach generating a first identifier in response to a first request, generating a second identifier in response to a second request, wherein those identifiers correspond to the respective requests. Still further, Snyder does not teach comparing

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the first identifier and the second identifier and returning a second portion of data if the identifiers match. Snyder is limited to an enhanced Internet search engine that returns a report page generated from a database of crawled Web pages in response to user requests.

For the above reasons, applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of Claim 1.

2. 35 U.S.C. § 103(a) Rejection

Referring now to the rejection of Claim 1 under 35 U.S.C. § 103(a) as being obvious over Landsman in view of Rieth, applicant submits that neither Landsman nor Rieth, individually or in combination, teach each of the limitations of Claim 1. The Office Action asserts that Landsman teaches limitations of obtaining a request for provider data, associating a first identifier with the request, and returning the first portion of the provider data. *See* Office Action, p. 7. Further, the Office Action admits that Landsman fails to teach storing the second portion according to the first identifier, obtaining a request for the second portion with an associated second identifier, and returning the second portion if the second identifier matches the first identifier. *Id.* at pp. 7-8. However, the Office Action asserts that Rieth resolves the deficiencies of Landsman by teaching "a system for storing objects according to a first hashed identifier and later requesting an object stored using a second hashed identifier which must match the first hashed identifier in order for the client to have access to the stored object." *Id.* at p. 8. Therefore, the Office Action asserts the combination of Landsman and Rieth would have been obvious to one with ordinary skill in the art at the time to teach each of the limitations recited in Claim 1. *Id.* For the following reasons, applicant respectfully asserts the combination of Landsman and Rieth fails to teach or suggest each of the limitations of amended Claim 1.

Referring first to Landsman, as acknowledged by the Office Action, Landsman fails to teach a first identifier, a second identifier, associating requests with the first and second

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identifier, and comparing those identifiers before returning data. Thus, it follows that Landsman also fails to teach generating a first identifier corresponding to the first request and in response to obtaining a second request, generating a second identifier corresponding to the second request.

Rieth, like Landsman, also fails to teach each of the limitations of Claim 1. In particular, Rieth does not teach or describe "storing the second portion of the provider data according to the first identifier." The Office Action asserts that Rieth teaches this limitation at Col. 4, lines 30-53, and Col. 5, lines 11-15. However, as described above, Rieth describes a system for operating a server to authorize client access to server objects that were previously provided to the server by that particular client. As acknowledged in the Office Action, "Rieth teaches a system for storing objects according to a first hashed identifier and later requesting the objects stored." Office Action, p. 8. The stored objects are originally provided by the client, the first hashed identifier is based on the object and the client, and it is the same client that later access the object. *See* Rieth, col. 3, lines 55-63. Accordingly, Rieth is limited to an authorization system that provides access to objects that were initially provided by the requesting party. In contrast, as called for in Claim 1, the requested provider data includes a first portion and a second portion, and it is the second portion of the requested provider data that is stored. The stored data is not provided, it is requested. Rieth, like Landsman, is limited to accessing single portion data, not data containing a first portion and a second portion that is separately accessed and stored, as called for in Claim 1.

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every limitation recited in the claim. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993). Landsman and Rieth, alone or in combination, fail to teach or suggest the limitations of obtaining a first request for provider data,

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returning a first portion of the provider data, storing the second portion, receiving a second request, and returning the second portion of provider data.

For the above reasons, applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection of Claim 1.

B. Claims 2-12

Claims 2-12 are dependent on Claim 1. As discussed above, Snyder, Landsman and Rieth, singly or in combination, fail to teach or suggest the limitations recited in Claim 1. Accordingly, for the above-mentioned reasons, dependent Claims 2-12 are allowable over the cited references. In addition, Claims 2-12 further add to the nonobviousness of the claims.

C. Claim 13

Claim 13, like Claim 1, was rejected under 35 U.S.C. § 102(e) as being anticipated by Snyder, and under 35 U.S.C. § 103(a) as being obvious over Landsman in view of Rieth. Claim 13, as amended, reads as follows:

> 13. A computer system for providing data to a requesting party, the system comprising:
>
> at least one content requestor for requesting provider data; and
>
> a content server in communication with the content requester and operable to provide a first and second portion of the provider data to the content requester.
>
> wherein the content server generates a first identifier corresponding to the request, returns the first portion of the provider data and stores the second portion of the provider data according to a first identifier upon receiving a first request for the provider data from the content requestor; and
>
> wherein the content server generates a second identifier corresponding to a second request, and returns the second portion of the provider data upon receiving a second request for the provider data from the content requestor if a second identifier matches the first identifier.

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As recited above, Claim 13 includes limitations similar to those discussed with respect to Claim 1. In particular, Claim 13 includes the limitations of generating "a first identifier corresponding to the request" and storing "the second portion of the provider data according to the first identifier upon receiving a first request for the provider data from the content requester." Additionally, Claim 13, like Claim 1, includes the limitation of generating "a second identifier corresponding to a second request" and returning "the second portion of the provider data upon receiving a second request for the provider data from the content requester if the second identifier matches the first identifier." As discussed above with respect to independent Claim 1, Snyder fails to teach or suggest those limitations. In contrast, Snyder is limited to an improved Internet search engine. There is no discussion in Snyder of generating a first identifier, corresponding to a first request, generating a second identifier corresponding to a second request, storing a second portion of the data corresponding to the first identifier, and returning the second portion of the data if the first identifier matches the second identifier.

Additionally, as discussed above with respect to independent Claim 1, Landsman and Rieth, alone or in combination, fail to teach generating a first identifier, storing a second portion of the provider data according to the first identifier, generating a second identifier, and returning the second portion of the data if the first identifier matches the second identifier. In contrast, as acknowledged in the Office Action, Landsman fails to teach those limitations. Additionally, as discussed above, Rieth is limited to a system that allows access by a client to objects that were previously provided by the client, not objects that were requested by the client. There is no discussion in either reference storing a second portion of the requested data corresponding to a first identifier. In contrast, both Landsman and Rieth are limited to single portion data requests and obtaining single portion data.

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Because the cited references fail to teach each of the limitations recited in independent Claim 13, applicant asserts that Claim 13 is not anticipated by Snyder nor is it obvious in view of Landsman and Rieth. Accordingly, applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of Claim 13 and the 35 U.S.C. § 103(a) rejection of Claim 13.

D. Claims 14-18

Claims 14-18 are dependent on Claim 13. As discussed above, Snyder, Landsman, and Rieth, individually or in combination, fail to teach or suggest each of the limitations recited in Claim 13. Accordingly, for the above-mentioned reasons, dependent Claims 14-18 are allowable over the cited references. In addition, Claims 14-18 further add to the nonobviousness of the claims.

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CONCLUSION

Based on the above-referenced arguments and amendments, applicant respectfully submits that all of the claims in the present application, Claims 1-18, are allowable over the cited and applied references. Because the cited and applied references fail to teach a computer system for providing and associating provider data, including a first a second portion in response to a data request wherein identifiers are generated and associated in response to requests for the data, applicant respectfully requests withdrawal of the rejection of the claims and allowance of the present application.

If any questions remain, applicant requests that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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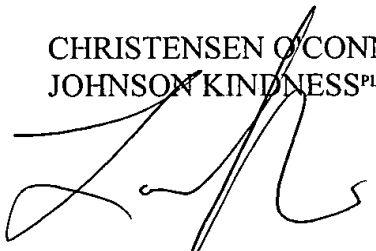

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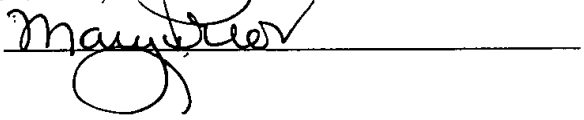
Date: May 5, 2004



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